

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JANE DOE, a minor,)	
)	
Plaintiff,)	
)	No. 08 C 1149
v.)	
)	Judge: Elaine Bucklo
FERNANDEZ FOOD SERVICES, INC., an)	
Illinois corporation, LA MAGDALENA, INC., an)	Magistrate Judge: Nan Nolan
Illinois corporation, LA MAGDALENA II, INC.,)	
an Illinois corporation, LA MAGDALENA III,)	
INC., an Illinois corporation, ADDISON)	
RESTAURANT SERVICES, INC., an Illinois)	
corporation, d/b/a LA HACIENDA DE LOS)	
HERNANDEZ, BESA MI TACO, INC., an Illinois)	
Corporation.)	
)	
Defendants.)	

REPORT OF PARTIES PLANNING MEETING

NOW COMES the Plaintiff, JANE DOE, by and through her attorneys, the Law Offices of Eugene K. Hollander, and Defendant, La Magdalena II, Inc., by and through its attorneys, Gaffney & Gaffney, and for their Report of Parties Planning Meeting, states as follows:

1. Meeting. Pursuant to FED. R. CIV. P. 26(f), a meeting was held on April 8, 2008 at The Law Offices of Eugene K. Hollander and was attended by Eugene K. Hollander for Plaintiff and Glenn R. Gaffney for Defendants.

2. Pre-trial Schedule. The parties jointly propose to the court the following discovery plan:

a. Discovery will be needed on the following subjects: Plaintiff's claim of sexual harassment, Plaintiff's damages, Defendants' business operations, Defendants' net worth, and hiring, supervision and retention of Fernando Lopez.

Defendant will conduct discovery on the affirmative defenses raised in the Answer.

b. Disclosures pursuant to Pursuant to FED. R. CIV. 26(a)(1) to be made by April 22, 2008. All fact discovery, with the exception of treating physicians/health care professionals, and experts as to damages, to be commenced in time to be completed by September 8, 2008.

c. The parties expect they will need approximately 6 depositions each.

d. Reports from liability retained experts under Rule 26(a)(2) due:

-from plaintiff by August 8, 2008 and to be deposed by August 22, 2008.

-from defendants by September 8, 2008, and to be deposed by September 22, 2008.

e. All potentially dispositive motions should be filed by October 8, 2008. Plaintiff may identify experts on damages within thirty (30) days of a ruling on a dispositive motion. Defendants may depose any said expert(s) within fourteen (14) days thereafter, and identify their own expert(s) within thirty (30) days after deposing the Plaintiff's experts. Plaintiff shall have fourteen (14) days after the Defendants identify their expert(s) to depose said expert(s).

f. Final pretrial order: Plaintiff to prepare proposed draft by October 22, 2008 if no dispositive motion is filed. Parties to file joint final pretrial order by November 6, 2008 if no dispositive motion is filed.

g. The case should be ready for trial by December 1, 2008 if no dispositive motion is filed and at this time is expected to take approximately one week.

h. Certain Defendants have filed a 12b6 Motion. The Motion involves factual and legal issues. The parties wish to address the Court regarding briefing and discovery on the Motion.

3. Settlement. The Plaintiff has made a settlement demand, and the Defendants have made a settlement offer. The parties continue to discuss settlement, but cannot make further progress regarding discovery until some discovery has taken place.

4. Consent. Parties do not consent unanimously to proceed before a Magistrate Judge.

Date: _____

Attorney for Plaintiff:

By: /s/Eugene K. Hollander

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